

State of California



Fair Political Practices Commission

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(916) 322-5662

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322-6444

March 4, 1985

Mr. Edward Lopez, Past President
Legislative Committee Chairman
Central Coast Polygraph
118 Bel Air Drive
Scotts Valley, CA 90566

RE: FPPC Advice Letter A85-023

Dear Mr. Lopez:

I apologize for the delay in responding to your letter of February 4, 1985. The facts as I understand them are as follows:

The California Association of Polygraph Examiners has a pledge program where members of the Association may pledge a monetary amount for future contributions to state legislators. Because the pledge cards were received late this year, the Association's Board of Directors authorized a \$1,000 loan to the pledge program. The \$1,000 has been contributed to a state-elected officeholder's fundraiser. The loan will be repaid to the Association's general fund by pledges it receives from its members.

You asked if the Association will have to register as a committee and file campaign statements.

Government Code Section 82013 defines committee to mean "any person or combination of persons who directly or indirectly:
(a) receives contributions totaling five hundred dollars (\$500) or more in a calendar year;..."

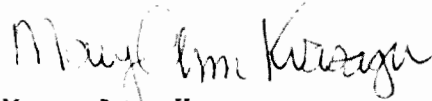
As soon as the Association receives \$500, it will have to register with the Secretary of State's office and file campaign statements.

I have enclosed for your information and use Forms 410, 420, 450, the 1985 "Information Manual on Campaign Disclosure Provisions of the Political Reform Act," "Guide for Candidates and Treasurers," and "Recordkeeping Manual."

Mr. Edward Lopez
March 4, 1985
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I hope the above information is of assistance. Please do not hesitate to contact me if you have additional questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary Ann Kvasager".

Mary Ann Kvasager
Political Reform Consultant

MAK:bb
Enclosures

Central Coast Polygraph

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513 Water St.
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February 4, 1985

Mary Ann Kuasager
Fair Political Practices Commission
1100 "K" St.
Sacramento, CA 95814

Dear Ms. Kuasager:

The California Association of Polygraph Examiners has in the past advised our members to make political donations to legislators in a "pledge" campaign--i.e.: the legislative chairman advises the members who have pledged which legislators have helped in our legislative efforts, and the individual members have sent personal checks to those legislators.

This year, our pledge cards were received later than anticipated, and the Board of Directors of the Association authorized a loan of \$1000 to the pledge program in order to attend a function occurring before we could activate the required pledges. This \$1000 loan is to be repaid to the Association general fund by pledges from the members.

My questions are: 1) By loaning this money to the pledge program, does the Association have to register with your agency? If so, 2) what registration documents are necessary? And, 3) will a one time registration suffice if in the future we advise our members to make individual donations to legislators as has occurred in the past?

Our total pledges made by members total exceed \$3000 per year.

Thank you for your cooperation.

Sincerely,

Edward Lopez

Edward Lopez, Past President
Legislative Committee Chairman

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